

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JING ZHANG, WEI FAN,
MINGLIAN ZHANG, AND JUN
ZHOU,

PLAINTIFFS,

v.

XUEYUAN HAN, HANFOR
HOLDINGS CO., LTD., HF
HOLDINGS LIMITED., HANFOR
CAPITAL MANAGEMENT CO.,
LTD., NUOYUAN CAPITAL
MANAGEMENT COMPANY LTD,
GEORGE XU, JUNJUN FENG,
WENNAN AO, BZ INDUSTRIAL
(CHINA), BZ INDUSTRIAL
(VIRGIN ISLANDS), BZ
INDUSTRIAL (CAYMAN
ISLANDS), HANFOR (CAYMAN)
LIMITED, HFRE LLC, HF
CAPITAL MANAGEMENT CAY
INC., HF COSMOPOLITAN BETA
L.P., HENGTAI SECURITIES CO.,
LTD., JOHN DOES 1-10, JANE
DOES 1-10, AND ABC-XYZ CORP.
1-10,

DEFENDANTS.

CASE NO.: _____

Document Electronically Filed

**PROPOSED EX PARTE ORDER TO
SHOW CAUSE FOR TEMPORARY
RESTRAINING ORDER AND
ATTACHMENT**

JURY TRIAL DEMANDED

Upon reading of the complaint dated February 23, 2021, the affidavit of emergency of Plaintiff Jing Zhang (sworn to on February 10, 2021), the memorandum of law, and the exhibits annexed thereto; and having found sufficient reason being alleged and good cause appearing therefrom, including explanation set forth in the affidavit which demonstrates that the Temporary Restraining Order and Attachment Order set forth herein ought to be issued without notice to avoid irreparable injury to Plaintiffs given flight risk, it is hereby:

ORDERED that Defendants Xueyuan Han, Hanfor Holdings Co., Ltd., Hanfor Capital Management Co., Ltd., Nuoyuan Capital Management Company Ltd, George Xu, Junjun Feng, Wennan Ao, BZ Industrial (China), BZ Industrial (Virgin Islands), BZ Industrial (Cayman Islands), Hanfor (Cayman) Limited, HFRE LLC, HF Capital Management Cay Inc., HF Cosmopolitan Beta L.P., Hengtai Securities Co., Ltd., John Does 1-10, Jane Does 1-10, and ABC-XYZ-Corp. 1-10 (collectively, “Defendants”), or their counsel shall appear and show cause before this Court, on ___ February, 2021, why this Court should not enter a Temporary Restraining Order, pending final ruling on the Complaint against the Defendants, enjoining them from further violations of law alleged in Plaintiff's Complaint, continuing the freeze of their assets, and imposing such additional relief as may be appropriate.

ORDERED, that, sufficient reason having been shown therefore, pending the hearing of Plaintiffs’ motion for attachment, pursuant to Fed. R. Civ. P. Rule 64, **Defendants and all of their successors, assigns, agents, employees, directors, attorneys or other persons acting on its behalf or in connection with it**, are hereby temporary restrained and enjoined from transferring, disposing of, encumbering or otherwise causing, instructing or requesting any diminishment, transfer or disbursement of assets held by Defendants or by Defendants on behalf

of Plaintiffs, including the property located at 377 Rector Place, Unit PHB, New York, NY 10280, and 554 Third Avenue, Unit PHA, New York, NY 10016, as well as the 2020 Rolls Royce Cullinan held in Defendant Mr. Han's name, as well as the 574,503 shares of NIO Inc., worth approximately \$30 million USD based on the current market value, that are held by Defendant Mr. Han through his proxy corporation, HF Holdings Limited; and it is hereby

ORDERED that the properties located at 377 Rector Place, Unit PHB, New York, NY 10280, and 554 Third Avenue, Unit PHA, New York, NY 10016, and his 2020 Rolls Royce Cullinan, the shares of NIO stock mentioned above, and any personal items of value and/or hard currency located therein must be seized by the U.S. Marshals and held as collateral pending the result of this lawsuit, given the enormous flight risk and illegal activity committed by Defendant Mr. Han, his associates, and the Defendant corporations; and it is hereby

ORDERED that Plaintiffs file a bond on or before _____, 2021, in the sum of _____, conditioned that the Plaintiffs, if it is finally determined that they were not entitled to a temporary restraining order, will pay to the Defendants all damages and costs that may be sustained by reason thereof; and it is further

ORDERED, that service of a copy of this Temporary Restraining Order and Order to Show Cause for an Order of Attachment, and each paper identified in the first paragraph hereof shall be deemed good and proper service if served by _____, 2021:

- (i) By email to han@hanfor.cn;
- (ii) By FedEx (or similar courier) to 377 Rector Place, Unit PHB, New York, NY 10280;
- (iii) By FedEx (or similar courier) to 554 Third Avenue, Unit PHA, New York, NY 10016.

ORDERED, that Defendants shall file and serve any response or opposition to this Order no later than _____, 2021 via the Court's Electronic Filing System; and, it is further

ORDERED, that Plaintiff shall serve any reply papers in further support of its motion for the order of attachment by _____, 2021 via the Court's Electronic Filing System; and it is further

ORDERED, that a hearing on the Motion for an Order of Attachment will be held on _____, 2021 at Courtroom ____ at 500 Pearl Street, New York, New York, or as soon thereafter as counsel may be heard.

ISSUED: New York, New York

_____, 2021
At ____ m.

UNITED STATES DISTRICT JUDGE